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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

20 WAYMO LLC,  
21 Plaintiff,  
22 v.  
23 UBER TECHNOLOGIES, INC.,  
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
25 Defendant.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
JOHN LAHAD IN SUPPORT OF  
DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
PRECIS LETTER REQUESTING  
PERMISSION TO FILE MOTION  
FOR SUMMARY JUDGMENT**

Judge: The Honorable William Alsup  
Trial Date: October 10, 2017

1 I, John Lahad, declare as follows:

2 1. I am an attorney with the law firm of Susman Godfrey LLP. I am a member in  
3 good standing of the Bar of the State of Texas. I make this declaration based on personal  
4 knowledge and, if called as a witness, I could and would testify competently to the matters set  
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and  
6 Ottomotto LLC's Precis Letter Requesting Permission to File a Motion for Summary Judgment.

7 2. Attached as **Exhibit 1** are true and correct excerpts of the August 11, 2017  
8 deposition of Andrew Wolfe.

9 3. Attached as **Exhibit 2** are true and correct excerpts of the August 3, 2017  
10 deposition of Pierre-Yves Droz in his capacity as a 30(b)(6) witness for Waymo.

11 4. Attached as **Exhibit 3** are true and correct excerpts of the July 12, 2017 deposition  
12 of William McCann.

13 5. Attached as **Exhibit 4** is a true and correct copy of a document marked as Exhibit  
14 1078 at the deposition of William McCann.

15 6. Attached as **Exhibit 5** is a true and correct copy of U.S. Patent No. 8,559,107 to  
16 Chann et al.

17  
18 I declare under penalty of perjury under the laws of the United States that the foregoing is  
19 true and correct. Executed this 22nd day of August, 2017, in Houston, Texas.

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*/s/ John Lahad*  
JOHN LAHAD

## ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that John Lahad has concurred in this filing.

Dated: August 22, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ